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IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF OREGON

LAURA HANSON,

Plaintiff,

v.

**STATE OF OREGON
LEGISLATIVE ASSEMBLY,**

Defendant.

Case No. 3:21-CV-00780-SI

**PLAINTIFF'S PROPOSED
VERDICT FORM**

Plaintiff Laura Hanson hereby submits the proposed verdict form attached to this pleading.

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Dated this 11th day of April, 2024.

Respectfully submitted,

/s/ Rebecca Cambreleng
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**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF OREGON
PORTLAND DIVISION**

LAURA HANSON,

Plaintiff,

v.

**STATE OF OREGON
LEGISLATIVE ASSEMBLY,**

Defendant.

Case No. 3:21-CV-00780-SI

VERDICT

We, the jury, being first duly empaneled and sworn, find our verdict as follows:

All of you must agree on the following questions.

1. Disability Discrimination

A. Is it more likely than not that defendant discriminated against Laura Hanson in the terms, conditions, or privileges of her employment based on her disability?

Answer: Yes _____ No _____

B. Is it more likely than not that defendant failed to accommodate Laura Hanson's disabilities, leading to her termination from Senator Gelser's office?

Answer: Yes _____ No _____

C. Is it more likely than not that defendant failed to accommodate Laura Hanson's disabilities, leading to her termination from Representative Pham's office?

Answer: Yes _____ No _____

2. Medical Leave Interference or Discrimination

A. Is it more likely than not that defendant interfered with any of Laura Hanson's attempts to take medical leave?

Answer: Yes _____ No _____

B. Is it more likely than not that defendant discriminated against Laura Hanson in the terms and conditions of her employment in response to any inquiry about OFLA rights?

Answer: Yes _____ No _____

3. Whistleblower Retaliation

Is it more likely than not that that defendant retaliated against Laura Hanson in response to her good faith reports that she believed were evidence of a violation of a law, rule, or regulation?

Answer: Yes _____ No _____

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4. Public Employee Whistleblower Retaliation

Is it more likely than not that defendant retaliated against Laura Hanson in response to any disclosure she made that was evidence of violation of law, rule, regulation, mismanagement, or abuse of authority?

Answer: Yes _____ No _____

If you answered *no* to **all** of the questions above, your verdict is for the Defendant. Do not answer any further questions. Have your presiding juror sign this Verdict form.

If you answered *yes* to **any** of the questions above, move on to Question 5.

5. If you answered *yes* to Question 1 (Disability Discrimination), please answer the questions below about those claims:

A. What, if any, are Laura Hanson's economic damages? \$ _____

B. What, if any, are Laura Hanson's noneconomic damages? \$ _____

6. If you answered *yes* to Question 3 (Whistleblower Retaliation), please answer the questions below about that claim:

A. What, if any, are Laura Hanson's economic damages? \$ _____

B. What, if any, are Laura Hanson's noneconomic damages? \$ _____

7. If you answered *yes* to Question 4 (Public Employee Whistleblower Retaliation), please answer the questions below about that claim:

A. What, if any, are Laura Hanson's economic damages? \$ _____

B. What, if any, are Laura Hanson's noneconomic damages? \$ _____

Dated this ____ day of _____, 2024

Presiding Juror Signature

Presiding Juror Printed Name

CERTIFICATE OF SERVICE

I certify that on April 11, 2024, I served the foregoing **PLAINTIFF'S PROPOSED VERDICT FORM** upon the parties hereto via electronic means through the Court's Case Management/Electronic Case File system and via electronic mail:

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